

Exhibit I

From: Loyd, Lara J.
Sent: Monday, July 15, 2013 3:52 PM
To: 'Hoelzer, Lauren'
Cc: Clark, Bruce E.; Schwartz, Matthew A.; Slack, Richard; Burns, Amanda; Ekono, Zeh S.
Subject: RE: Giants Stadium Discovery

Lauren,

Thank you for the prompt response. This schedule works on our end.

Best,
Lara

From: Hoelzer, Lauren [mailto:lauren.hoelzer@weil.com]
Sent: Monday, July 15, 2013 2:14 PM
To: Loyd, Lara J.
Cc: Clark, Bruce E.; Schwartz, Matthew A.; Slack, Richard; Burns, Amanda; Ekono, Zeh S.
Subject: RE: Giants Stadium Discovery

Lara:

For the convenience of the Court and to ensure that we have sufficient time to prepare for the hearing, we cannot agree to a schedule that leaves less than seven days between the reply due date and the hearing. In addition, the dates below were selected to work around certain vacation schedules in August. Please let me know if the following schedule will accommodate your concerns.

1. Motion to Quash Due – Tuesday, July 23 by noon
2. Objection Due – Friday, August 23
3. Reply Due – Wednesday, September 11
4. Hearing – Wednesday, September 18 at 10am

Yours,

Lauren

From: Loyd, Lara J. [mailto:Loydl@sullcrom.com]
Sent: Monday, July 15, 2013 11:06 AM
To: Hoelzer, Lauren
Cc: Clark, Bruce E.; Schwartz, Matthew A.; Slack, Richard; Burns, Amanda; Ekono, Zeh S.
Subject: RE: Giants Stadium Discovery

Lauren,

For the Baupost motion, we agree to accommodate your conflict by setting the hearing date for September 18, rather than August 21. Given that this hearing is more than nine weeks away, we are also amenable to extending the overall time allotted to prepare your response to the motion. However, as we did not receive your counterproposal as to schedule until last Friday, we propose the following:

1. Motion to Quash Due – Wednesday, July 24
2. Objection Due – Monday, August 26
3. Reply Due – Friday, September 13
4. Hearing – Wednesday, September 18 at 10am

Please confirm that this schedule is acceptable. We look forward to hearing from you on the other open issues.

Best Regards,
Lara

From: Hoelzer, Lauren [mailto:lauren.hoelzer@weil.com]
Sent: Friday, July 12, 2013 3:49 PM
To: Loyd, Lara J.
Cc: Clark, Bruce E.; Schwartz, Matthew A.; Slack, Richard; Burns, Amanda; Ekono, Zeh S.
Subject: RE: Giants Stadium Discovery

Dear Lara:

While we disagree that the technical issue with Lehman's productions 5 and 6 caused sufficient "delay" to justify a one-month extension of the deadlines set forth in the Discovery Protocol (the vendor resolved the technical issue and re-produced the documents within 31 hours of your notification of the issue at 5:36pm on July 3), Lehman is willing to agree to a 30-day extension of the deadlines given the discovery issues that remain open.

As for the briefing schedule for the Baupost motion to quash, since our email of July 2, we have confirmed that Rich will have to argue a motion in another matter on August 21. Independently, we need more than the 2 weeks/3 days in your proposed schedule to file a response. We therefore propose the following briefing schedule:

1. Motion to Quash Due – Tuesday, July 17
2. Objection Due – Friday, August 23
3. Reply Due – Wednesday, September 11
4. Hearing – Wednesday, September 18 at 10am

Please let us know if this schedule works for you.

Finally, I note that Production 07, which we made last night, includes the documents of Katie Chan and John Russ, the two custodians whose documents you asked that we collect and search, to which we agreed on June 20.

We will be in touch about the other open issues next week.

Yours,
Lauren



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